

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FEDEX SUPPLY CHAIN LOGISTICS
& ELECTRONICS, INC.,
Plaintiff,

v.

JAMES E. GOODMAN, JR., JOHN
GOODMAN, JONATHAN GOODMAN,
JAKE GOODMAN, JOSEPH “JODY”
GOODMAN, JAMES FRINZI, SHALOM
AUERBACH, NEIL AUERBACH,
STEVEN ZAKHARYAYEV, EVALINA
PINKHASOVA, GENESIS NETWORKS
TELECOM SERVICES, LLC, GNET
ATC, LLC, GREATER TECH
HOLDINGS, INC. f/k/a GOODMAN
TELECOM HOLDINGS, LLC,
GOODMAN INVESTMENT
HOLDINGS, LLC, UNIFIED FIELD
SERVICES, INC., AMERICAN METALS
RECOVERY AND RECYCLING, INC.
a/k/a MBG HOLDINGS, INC.,
MULTIBAND FIELD SERVICES, INC.,
HSB HOLDINGS, LLC f/k/a
MULTIBAND GLOBAL RESOURCES,
LLC, AMR RESOURCES, LLC,
HUDSON CLEAN ENERGY
ENTERPRISES, LLC, 18920 NW 11th,
LLC, PROSPERITY BANCSHARES,
INC., THE FRINZI FAMILY TRUST,
ALLIANCE TEXAS HOLDINGS, LLC,
AUERBACH PARTNERS, LP, and
ONEPATH SYSTEMS, LLC,

Defendants.

Civil Action No. 3:23-cv-02397

**UNOPPOSED MOTION TO EXTEND RESPONSIVE PLEADING DEADLINE FOR
JAMES FRINZI AND THE FRINZI FAMILY TRUST**

James Frinzi, The Frinzi Family Trust and HSB Holdings, LLC f/k/a Multiband Global Resources, LLC (together, the “Frinzi Defendants”) file this *Unopposed Motion to Extend*

Response Deadline and would respectfully show as follows:

FedEx Supply Chain Logistics & Electronics, Inc. (the “Plaintiff”) commenced this action against the Frinzi Defendants and numerous other defendants by filing its *Complaint* in this Court on October 27, 2023 [Dkt. No. 1].

A related proceeding between Scott M. Seidel, Trustee (the “Trustee”), the trustee of Goodman Networks, Inc., on the one hand, and the Plaintiff, on the other hand, is pending as Case No. 23-03091-mvl (the “Adversary Proceeding”) before the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the “Bankruptcy Court”).

In the Adversary Proceeding, the Trustee is seeking a preliminary injunction through the *Trustee’s Motion for Preliminary Injunction* (the “PI Motion”).

The Frinzi Defendants respectfully request an extension of the deadline for them to file an answer, motion, or other document in response to the Complaint to a date twenty-one (21) days after the Bankruptcy Court enters a final order adjudicating the PI Motion.

WHEREFORE, PREMISES CONSIDERED, the Frinzi Defendants request that this Court enter an order extending the deadline for them to file an answer, motion, or other document in response to the Complaint to a date twenty-one (21) days after the Bankruptcy Court enters a final order adjudicating the PI Motion.

Dated: December 13, 2023

Respectfully submitted,

/s/ Paul T. Elkins

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**COUNSEL FOR JAMES FRINZI, THE FRINZI FAMILY
TRUST AND HSB HOLDINGS, LLC F/K/A
MULTIBAND GLOBAL RESOURCES, LLC**

CERTIFICATE OF CONFERENCE

I hereby certify that on December 13, 2023, I conferred with counsel for Plaintiff, and they indicated they were not opposed to the relief requested in this Motion.

/s/ Paul T. Elkins

Paul T. Elkins

CERTIFICATE OF SERVICE

I certify that on December 13, 2023, a true and correct copy of the foregoing document was served by the Court's ECF noticing system on all parties that consent to such service.

/s/ Paul T. Elkins

Paul T. Elkins